

# **EXHIBIT 2**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

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BABY DOE, et al.,

Plaintiffs,

v. Civil Action No.

3:22cv00049-NKM-JCH

JOSHUA MAST, et al.,

Defendants.

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Video-recorded Deposition of

JONATHAN MAST

Monday, July 17, 2023

9:33 a.m.

Charlottesville, Virginia

Reported by: Mark E. Brown, RPR

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1 today please send 5K via ACH to Jonathan Mast." Do  
2 you see that?

3 A Yes, sir.

4 Q Did you receive \$5,000 from the Pipe Hitter  
5 Foundation on or after May the 19th?

6 A After, yes, sir.

7 Q Do you recall when the money came in?

8 A I think it was about five or six days.

9 Q So May the 19th was a Friday. Would it  
10 have been some time in the following week?

11 A Yes, sir, I think that's right. There was  
12 a small delay where I had to follow up and they said  
13 that there was some kind of error on their end but I  
14 think that's about right.

15 Q And do you identify that account  
16 information on Exhibit 6 to be for your personal bank  
17 account?

18 A I believe it is. I don't have the numbers  
19 memorized but I believe it is.

20 Q I looked up the routing number. It is for  
21 the First National Bank in Altavista. Is that where  
22 you bank?

23 A That's me.

24 Q Is that account in your name only?

25 A Me and my wife.

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1 Q And you understood that the money was  
2 coming to you and to your First National Bank account  
3 from the Pipe Hitter Foundation in furtherance of the  
4 grant agreement that you had signed on May the 10th,  
5 right?

6 A Yes, sir.

7 Q And what did you do with the \$5,000?

8 A I forwarded it to my brother.

9 Q How did you do that?

10 A Check.

11 Q Same day? Soon after you got the money?

12 A Soon after.

13 Q You send all \$5,000 to your brother?

14 A No. I -- this is the instance where I had  
15 reimbursed myself a thousand because I had loaned him  
16 a thousand.

17 Q You had advanced him a thousand so then you  
18 kept a thousand of the five?

19 A Uh-huh.

20 Q And sent the four to him?

21 A Correct.

22 Q Has the Pipe Hitter Foundation sent more  
23 money to you since this initial installment of  
24 \$5,000?

25 A No, sir.

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1 A Yeah, I was aware of that.

2 Q So do you know that the Pipe Hitter  
3 Foundation not only posted what we see here in  
4 Exhibit 13 to its web page but also pushed out an  
5 email to its members?

6 A That was initially discussed as a  
7 possibility but it never -- it was not discussed  
8 afterwards, but I assume that was probably the case,  
9 yes.

10 Q So you don't know one way or the other what  
11 else the Pipe Hitter Foundation did with this  
12 information other than what we see in Exhibit 13?

13 A Correct. I never received the email  
14 publication, I don't think.

15 Q Do you recall, Mr. Mast, sending an email  
16 to Dena Cruden on May the 17th asking if Joshua could  
17 use Pipe Hitter Foundation grant money for basic  
18 living necessities?

19 A I think I did. I don't know about the date  
20 but I remember having a conversation with her at some  
21 point along those lines.

22 MR. POWELL: Let's mark this 14, please.

23 (Mast Deposition Exhibit No. 14 was marked  
24 for identification and attached to the  
25 transcript.)

1 BY MR. POWELL:

2 Q Mr. Mast, you have in front of you  
3 Deposition Exhibit 14 which you will see is an  
4 exchange of text messages between you and Ms. Cruden  
5 starting with your initiating text there at the top  
6 of the first page, Wednesday, May 17, where you text  
7 her, quote, "Would you have time to talk for a few  
8 moments regarding funds raised being distributed to  
9 my brother," close quote. Do you see that?

10 A I do.

11 Q And then you go on in the next paragraph to  
12 say that he had -- he Joshua had confided in you that  
13 he was out of money and was praying for a miracle,  
14 and you were wondering if some of the Pipe Hitter  
15 funds could be used -- you will see there in the  
16 third-to-the-last line -- quote, for basic living  
17 necessities. Do you see that?

18 A I do.

19 Q Tell me what you remember about your  
20 conversation with Dena about this subject.

21 A I remember talking to her that I was -- I  
22 had at some point talked to my brother, I don't  
23 remember when, but he had said that things were  
24 pretty tight financially and told me a little bit  
25 about that and that was the end of the conversation.

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1           A       Yes. Most of the information came from him  
2                   at the time that it occurred, correct.

3           Q       So during this time frame, April and May of  
4                   2023, Joshua knew you were in touch with the Pipe  
5                   Hitter Foundation, correct?

6           A       Yeah, I had told him that I had decided to  
7                   touch base with them and partner with them.

8           Q       Did he know in advance that you were going  
9                   to be interviewed by One America News?

10          A       No, he did not.

11          Q       Why didn't you tell him?

12          A       I purposely didn't tell anyone in my family  
13                   because there has been a lot of, oh, politely put,  
14                   negative media coverage of my family and I didn't  
15                   want any repercussions to go to anybody else but me.

16          Q       Were you aware on June 28th Joshua and  
17                   Stephanie's lawyers filed in the federal court case  
18                   something called a memorandum in opposition to  
19                   Plaintiffs' motion to show cause?

20          A       Yes, I think so. Is that where the cease  
21                   and desist letter gets filed with the complaint, my  
22                   brother's attorney filed their response to that?

23          Q       Let's back up a little bit. This is not a  
24                   memory quiz for you and I'm not asking you to  
25                   recreate what's in the court file.

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1                   MR. FRANCISCO: Objection. This document  
2 speaks for itself. It's a legal pleading not by  
3 Jonathan.

4 BY MR. POWELL:

5                   Q         Let me ask it another way. You testified  
6 just a few minutes ago that Joshua knew you were in  
7 touch with the Pipe Hitter Foundation in April and  
8 May of this year, correct?

9                   A         Well, yeah, because he had to know how I  
10 was sending him \$5,000 or \$4,000.

11                  Q         And you knew that he was in touch with the  
12 Pipe Hitter Foundation because he told you that  
13 someone from the Pipe Hitter Foundation was going to  
14 reach out to you. That's the text message that you  
15 had the initial contact with Dena on April the 9th.

16                  A         Sure. And I believe somewhere in this  
17 document says he had been put in touch with the Pipe  
18 Hitter and told them he couldn't work with them and  
19 that's why he directed them to another member of the  
20 family.

21                  Q         Right. So you were then in contact  
22 intermittently in April and May with the Pipe Hitter  
23 Foundation and Jonathan (sic) knew about that, didn't  
24 he?

25                  A         Joshua. Yes.